# UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	CRIMINAL COMPLAINT
v.	:	Magistrate No. 19- 678
KEITH VOOLGARIS,	:	
a/k/a KEITH WOOLQARIS,	:	
a/k/a KEITH GEORGE VOOLGARIS,	•	
a/k/a	:	

I, Maurice T. Polen, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

#### SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

#### SEE ATTACHMENT B

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Special Agent Maurice T. Polen Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,

continued on the attached page and made a part hereof.

September 5, 2019

**GEORGE VOOLGARIS** 

at Newark, New Jersey

Date

City and State

Honorable Joseph A. Dickson United States Magistrate Judge

### ATTACHMENT A

## Count 1 (Distribution of Child Pornography)

From on or about July 21, 2017 through at least on or about September 8, 2017, in Essex County, in the District of New Jersey, and elsewhere, defendant

KEITH VOOLGARIS,
a/k/a
KEITH WOOLQARIS,
a/k/a
KEITH GEORGE VOOLGARIS,
a/k/a
GEORGE VOOLGARIS,

did knowingly distribute material containing child pornography, as defined in 18 U.S.C. § 2256(8), using any means and facility of interstate and foreign commerce and that had been mailed, and had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Section 2252A(a)(2)(A) and Section 2.

#### ATTACHMENT B

I, Maurice T. Polen, am a Special Agent with the Federal Bureau of Investigation. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and evidence. Where statements of others are related herein, they are related in substance and part. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged. Because this Complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation.

## The Investigation

- 1. In or around August 2018, federal law enforcement agents executed a search warrant at the Minneapolis home of an individual referred to herein as "Individual 1," who was suspected of possessing and distributing child pornography via a "chat" website (the "Website"). That search yielded evidence that Individual 1 was in regular communication, via the Website, with a user called "lilmekim."
- 2. An examination of the "chat" conversations between Individual 1 and lilmekim revealed that, from on or about July 21, 2017 through on or about September 8, 2017, lilmekim had sent Individual 1 numerous links to specific files hosted by Dropbox (collectively, the "Dropbox Files"). Law enforcement agents were able to access several of the Dropbox Files and found them to be video files depicting child pornography.
- 3. Information provided by the Website revealed that the subscriber email address for the lilmekim Website account is lilmekim44@gmail.com (the "Lilmekim44 Email Account").
- 4. A law enforcement inquiry to the National Center for Missing and Exploited Children ("NCMEC") revealed that Dropbox had submitted the following reports to NCMEC regarding the Lilmekim44 Email Account:
- a. A report filed on or about January 13, 2017, stating that the user of the Lilmekim44 Email Account had uploaded 9 files to Dropbox on or about January 13, 2017, with hash values matching those of known child pornography; and
- b. A report filed on or about April 1, 2017, reporting that the user of the Lilmekim44 Email Account had uploaded 9 more files to Dropbox on or about March 31, 2017, with hash values matching those of known child pornography.

- 5. Information provided by Google pursuant to a search warrant revealed that the Lilmekim44 Email Account connected to various Internet Protocol ("IP") addresses during the relevant period:
- a. The Lilmekim44 Email Account connected to at least four IP addresses assigned to a telephone number ending in 9431, which was, at that time, subscribed to a "Keith Woolqaris" in Newark, New Jersey. Law enforcement was unable to identify any individual named "Keith Woolqaris" residing in or near Newark, New Jersey.
- b. The Lilmekim44 Email Account connected to at least one IP address assigned to "The Restoration Center," an emergency shelter in Newark, New Jersey, where defendant Keith Voolgaris ("VOOLGARIS") resided periodically during the relevant period.
- c. The Lilmekim44 Email Account connected to at least one IP address assigned to a telephone number ending in 4973, which was, at that time, subscribed to a "George Voolgaris" at an address in Kissimmee, Florida. VOOLGARIS is known to use the name "Keith George Voolgaris" as an alias.
- 6. The information obtained from Google also revealed that the contact telephone number for the Lilmekim44 Email Account is a number ending in 8564, which was subscribed during the relevant period to a "Martin Voolgaris" at an address in Kissimmee, Florida. A review of VOOLGARIS's public postings on Facebook indicates that VOOLGARIS has a brother named Martin Voolgaris who resides in Kissimmee, Florida.
- 7. On or about July 3, 2019, federal law enforcement agents conducted a consensual, non-custodial, recorded interview with VOOLGARIS, which lasted for approximately 75 minutes. During that interview, VOOLGARIS made the following statements, among others:
- a. That he sometimes goes by the name "George Voolgaris," including at the hospice where he currently resides;
- b. That he created, controlled, and used the "lilmekim" account on the Website;
- c. That he created, controlled, and used the Lilmekim44 Email Account;
- d. That, over the course of several years, he had downloaded and viewed images and videos depicting child pornography, including as recently as early 2019; and

e. That he had downloaded, viewed, and "shared" videos of prepubescent children being sexually penetrated, within the past two years.